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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 CARLA PETERSON,
14 Defendant.

Case No. 2:19-cr-00119-JAD-NJK

STIPULATION TO MODIFY
PRETRIAL RELEASE CONDITIONS¹

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16 IT IS HEREBY STIPULATED AND AGREED, by and between United States Attorney
17 Nicholas A. Trutanich and Assistant United States Attorney Christopher D. Baker, counsel for
18 the United States of America, and Federal Public Defender Rene L. Valladares and Assistant
19 Federal Public Defender Sylvia Irvin, counsel for Carla Peterson, that her conditions of release
20 be modified for the following reasons:

21 1. On June 6, 2018, Ms. Peterson made her initial appearance and was released on a
22 personal recognizance bond with specified conditions of pretrial release. *See* ECF No. 13. On
23 February 20, 2020, Ms. Peterson entered a plea of guilty pursuant to a negotiated plea agreement.
24 *See* ECF Nos. 37-39. At a hearing later that afternoon, she was admitted into the RISE Court
25 program. *See* ECF Nos. 40-41.
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¹ This motion is timely filed. There is no deadline for the filing of this motion.

2. As a participant in RISE, Ms. Peterson is subject to her RISE Court contract (ECF No. 41) and conditions of pretrial release including that “The defendant is allowed to travel with prior approval from Pretrial Services.” ECF Nos. 35, ¶74; 13.

3. This week, Ms. Peterson accepted an employment position as a regional sales representative that will require her to travel to Austin, Texas, for a 3-4 day training beginning on September 21. Thereafter, her employment will include teleworking and travel within Nevada and travel to Washington, Oregon, California, and Arizona. Consequently, the parties ask this Court to modify her travel condition to allow her to travel out of state for employment-related training and travel.

4. Before she accepted her employment position, Pretrial Services Officer Samira Barlow, defense counsel, and Ms. Peterson had discussed adding a mental health condition that would allow her counselor to discuss other counseling topics in addition to addressing issues concerning her substance use disorder. This condition will not increase her current counseling sessions or frequency but will give her counselor the ability to discuss topics other than substance use. For this reason, the parties ask the Court to add this condition.

5. Defense counsel and Government counsel agree to the addition of these pretrial conditions.

6. Pretrial Services Officer Barlow agree to the addition of these pretrial conditions.

7. Ms. Peterson continues to be in compliance with her pretrial release conditions.

DATED this 18th day of September, 2020.

RENE L. VALLADARES
Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

/s/ Sylvia Irvin
By _____
SYLVIA IRVIN
Assistant Federal Public Defender

/s/ Christopher D. Baker
By _____
CHRISTOPHER D. BAKER
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4

5 Plaintiff,

6 v.

7 CARLA PETERSON,
8

9 Defendant.

Case No. 2:19-cr-00119-JAD-NJK

ORDER

10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that following modifications shall be made to Ms.
12 Peterson's release conditions:

13 1. The defendant may travel within Nevada, and to Texas, Washington,
14 Oregon, California, and Arizona, for employment purposes.

15 2. The defendant shall participate in mental health treatment as directed by Pretrial
16 Services or the supervising officer.

17 3. The defendant shall pay all or part of the cost of the medical or psychiatric
18 treatment program or evaluation based upon her ability to pay as determined by Pretrial Services
19 or the supervising officer.

20
21 DATED this 18th day of September, 2020.

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24 UNITED STATES MAGISTRATE JUDGE
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